REMARKS

This paper is responsive to the final Office action dated November 16, 2007 (the "Final Office Action").

Claims 1-27, 35-38, and 40 are pending in the application.

Claims 1-5, 7-8, 12, 15-20, 37-38, and 40 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable over U.S. Patent No. 6,633,846 issued to Bennett et al. ("Bennett") in view of U.S. Patent No. 7,054,819 issued to Loveland ("Loveland"), and further in view of U.S. Patent No. 6,724,864 issued to Denenberg et al. ("Denenberg"). Claims 6, 9-11, 13-14, and 35-36 stand rejected under § 103(a) as purportedly being unpatentable over Bennett in view of Loveland in view of Denenberg, and further in view of U.S. Patent No. 5,915,001 issued to Uppaluru ("Uppaluru"). Claims 21-27 stand rejected under § 103(a) as purportedly being unpatentable over Uppaluru in view of Loveland and further in view of Denenberg.

The above amendments add no new matter. Support for the amendments may be found, for example on pp. 4, 22, and 43 of the Application as originally filed.

Rejections Under § 103(a)

Applicant respectfully submits that, as amended, the pending claims are allowable under § 103(a) because a person having ordinary skill in the art would not make the proposed combination of references and further because, even if combined, the cited portions of the references fail to disclose various limitations of the claims.

For example, Applicant's independent claim 1, as amended, recites:

1. A method for accessing data from an enterprise data system via voice input, comprising:

authenticating a login, wherein the authenticating comprises:

querying a database with a voice identifier,

in response to the querying, verifying the voice identifier and receiving a password for the enterprise data system from the database, and

establishing a connection with the enterprise data system using the password for the enterprise data system;

enabling access to a domain of the enterprise data system, wherein each of a plurality of domains of the enterprise data system corresponds to a respective object or type of data;

receiving a spoken language query to be performed against data stored in the accessed domain ;

converting the spoken language query into a data query and executing the data query to retrieve data that corresponds to the data query in the accessed domain;

determining a current navigation context for the access to the domain of the enterprise data system; and

providing feedback data corresponding to data retrieved from the accessed domain in a verbal format, wherein the feedback data is based, at least in part, on the current navigation context, and the providing the feedback data comprises:

performing a text-to-speech conversion on retrieved data to generate audio data; and

interspersing the audio data with waveform data of prompts to generate a verbalized system response.

(Emphasis added.)

As amended, claim 1 includes new limitations (along with limitations that were previously in dependent claim 10). With regard to the limitations of "determining a current

navigation context," the Final Office Action turns on p. 12 to Uppaluru. The Office Action thus relies on a combination of Uppaluru with Bennett (and with Loveland and Dannenberg as well) in an attempt to show prior art having these limitations.

A person having ordinary skill in the art would not combine Uppaluru with Bennett.

The Final Office Action argues on p. 12 that a Bennett and Uppaluru are analogous art, and that it would have been obvious to a person having ordinary skill in the art at the time of the invention to modify Bennett with the teachings of Uppaluru "in order to ease the subscriber's access." However, a person having ordinary skill in the art would not make this proposed modification of Bennett, for at least two reasons.

First, the proposed modification would not in fact ease a subscriber's access in Bennett. The cited feature in Uppaluru automatically fills in a query form with default parameters based on the type of service page being accesses by a subscriber:

> For example if the subscriber is accessing the weather service page, the agent fills in the subscriber's home town and other chosen cities automatically from the subscriber's attributes and preferences page. Similarly, if the subscriber is accessing the stock portfolio service page, the agent accesses the corresponding attributes and preferences page and fills in the subscriber's chosen portfolio of stocks in the query form. In addition, the agent also automatically fills in the appropriate subscriber attributes such as his/her access account number, password etc., thereby easing the subscriber's access while exploiting the availability services through web based queries.

(Uppaluru at 19:12-23 (emphasis added).) These teachings thus ease a subscriber's access by filling in personalized information into a query form submitted by a subscriber.

The Final Office Action proposes that this automated filling in from Uppaluru would assist a user of the Bennett system. The cited features of Bennett, however, do not use a query form into which personalized information needs to be inserted. The relevant portions of Bennett state in part:

> The 1st step as illustrated in FIG. 11A can be considered a high-speed first-cut pruning mechanism, and includes the following operations: after completing processing of the speech input signal, the user's query is recognized at step 1101, so that the text of the query is simultaneously sent to Natural Language Engine 190 (FIG. 1) at step 1107, and to DB Engine 186 (also FIG. 1) at step 1102. By "recognized" in this context it is meant that the user's query is converted into a text string of distinct native language words through the HMM technique discussed earlier.
>
> At NLE 190, the text string undergoes morphological linguistic processing at step 1108: the string is tokenized the tags are tagged and the tagged tokens are grouped Next the noun phrases (NP) of the string are stored at 1109, and also copied and transferred for use by DB Engine 186 during a DB Process at step 1110. As illustrated in FIG. 11A, the string corresponding to the user's query which was sent to the DB Engine 186 at 1102, is used together with the NP received from NLE 190 to construct an SQL Query at step 1103. Next, the SQL query is executed at step 1104, and a record set of potential questions corresponding to the user's query are received as a result of a full-text search at 1105, which are then sent back to NLE 190 in the form of an array at step 1106.

(Bennett at 24:56—25:12 (emphasis added).) In Bennett, therefore, a user's query is converted into a text string. This text string is linguistically processed and then used to construct an SQL Query to find a set of retrieved potential questions. Bennett goes on to explain that a best matching question is selected from the set (*id.* at 25:35-47), and that an answer is obtained for this question and provided to a client (*id.* at 25:62—26:3).

None of these features of the user query in Bennett, and none of these steps in responding to the query, involve the use of personalized information that can be automatically inserted for the user's convenience. In fact, Bennett does not contemplate a need for such personalized information, nor does Bennett provide a capacity to use such information. Thus, the proposed modification of Bennett would lead to a system in which personalized information could, at best, be inserted into a query that does not use it. Bennett's user query is not described as being one that uses, or relies on, or requires, the subscriber attributes such as home towns, stock portfolios, access account numbers, and password in the way that these are employed in the query forms of Uppaluru. The proposed modification of Bennett would not ease the use of the system by the user, because the user query in Bennett has no need for such features.

Accordingly, the proposed motivation for modifying Bennett with the teachings of Uppaluru, "in order to ease the subscriber's access," would in fact not ease any access to the Bennett subscriber. A person having ordinary skill in the art would readily recognize that these features of Uppaluru would be unused and unneeded in Bennett, and that the proposed modification would yield only an inoperable feature in the resulting system.

Second, a person having ordinary skill in the art would not make the proposed modification of Bennett because it would lead to any improvement of the Bennett system. The USPTO has set forth guidelines for rejections based on § 103(a) in the "*Examination Guidelines for Determining Obviousness under 35 U.S.C. § 103 in View of the Supreme Court Decision in* KSR International Co. v. Teleflex, Inc.," 72 F.R. 57526 (Oct. 10, 2007) (the "*Guidelines*"). None of the rationales in the *Guidelines* apply to the proposed inoperable combination of the cited portions of Bennett with the cited portions of Uppaluru. For example, the *Guidelines* note that a motivation to combine can exist when the combination "results in a product or process that

is more desirable, for example because it is stronger, cheaper, cleaner, faster, lighter, smaller, more durable, or more efficient." (72 F.R. at 57534.) None of these qualities—or any other desirable quality—would result from the proposed modification of Bennett's processing of user queries with Uppaluru's automated insertion of personal information. As discussed above, such a modification would not lead to any improvement in user convenience because Bennett's system does not use the personal information of Uppaluru. Moreover, Bennett's system does not use any other such information that would lend itself to being automatically inserted into a query. Such a modification of Bennett would not make the Bennett system cheaper, cleaner, faster, lighter, smaller, more durable, or more efficient, or in any other way more desirable than the system that is set forth by Bennett itself. Accordingly, a person having ordinary skill in the art would not have a motivation to combine these references.

At least for these reasons, independent claim 1 and all claims dependent therefrom are allowable under § 103(a). At least for similar reasons, independent claims 15, 21, 38, and 40 and all claims dependent therefrom are also allowable under § 103(a).

The cited portions of the references, whether taken individually or in combination, fail to disclose each limitation of Applicant's claims.

Moreover, even if the proposed modification of references were to be made, the cited passages—individually or collectively—would still fail to disclose Applicant's invention.

For example, Applicant's claim 1 includes determining a current navigation context for access to the domain of the enterprise data system and "providing feedback data" corresponding to data retrieved from an accessed domain in a verbal format. The feedback data is "based, at least in part, on the current navigation context." With regard to the feedback data in Applicant's

claim 1, the Final Office Action points to various features of Bennett, but none of these features is feedback based on a navigation context. For example, in 38:6-9, Bennett teaches that a computer interface can respond to a student query "with an answer preceded by the question as follows: 'The answer to your question . . . is as follows: . . .'." However, this response is not described as being feedback data based, at least in part, on a navigation context, as would be required to meet the limitations of Applicant's claim 1.

The cited portions of Uppaluru do not remedy this shortcoming of Bennett. The cited passages of Uppaluru state, in relevant part, that "if the subscriber is accessing the weather service page, the agent fills in the subscriber's home town and other chosen cities automatically from the subscriber's attributes and preferences page. Similarly, if the subscriber is accessing the stock portfolio service page, the agent accesses the corresponding attributes and preferences page and fills in the subscriber's chosen portfolio of stocks in the query form." (Uppaluru at 19:12-19.) These passages teach, at best, that a query form can be filled in based on the user's known preferences, so that the particulars that are relevant to the type of page can be ignored by the user.

These teachings are actually the opposite of the limitation in Applicant's claim 1. Uppaluru's query form is partially filled in based on what type of service page is being accessed, thereby rendering the particulars of the service page transparent to the subscriber; the subscriber's access is thus made easier because the subscriber can ignore these service page-dependent details. In contrast, Applicant's claim 1 requires that information based on a navigation context is affirmatively provided as feedback data. Claim 1 includes a limitation of "providing feedback data," and requires that "the feedback data is based, at least in part, on the current navigation context." No such feedback data is provided in the cited passages of

Uppaluru, which not only do not provide feedback data, but which teach the active avoidance of encumbering a subscriber with service page-dependent details.

Applicant notes that the cited passages of Loveland and Denenberg also fail to disclose "providing feedback data . . . based, at least in part, on the current navigation context." These limitations are not taught or fairly suggested by the cited portions of the references. At least for this reason, independent claim 1 and all claims dependent therefrom are allowable under § 103(a). At least for similar reasons, Applicant respectfully submits that independent claims 15, 21, 38, and 40 and all claims dependent therefrom are also allowable under § 103(a).

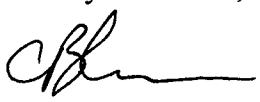
For the foregoing reasons, Applicant respectfully submits that claims 1, 15, 21, 38, and 40, as amended, and all claims depending therefrom are in a condition for allowance. Applicant therefore respectfully requests the Examiner's reconsideration and withdrawal of the rejection of these claims, and an indication of the Allowability of the same.

CONCLUSION

Applicant submits that all claims are now in condition for allowance, and a notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. The undersigned also hereby authorizes that any fees due for such extensions or any other fee associated with this submission be charged to deposit account 502306.

Respectfully submitted,



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